

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:)
)
SD-CHARLOTTE, LLC,) **Chapter 11**
RTHT INVESTMENTS, LLC,)
SD RESTAURANT GROUP, LLC,) **Case No. 20-30149**
SD-MISSOURI, LLC, and)
SOUTHERN DELI HOLDINGS, LLC,) **Jointly Administered**
)
Debtors.)

MOTION FOR ADMISSION *PRO HAC VICE* FOR ADAM L. SHIFF

I, Mignon A. Lunsford, am a partner with the law firm of Burr & Forman LLP, and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the “Local Bankruptcy Rules”) and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Adam L. Schiff to practice in this Court for the purpose of representing Itria Ventures, LLC in the above-captioned cases. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Mr. Schiff is a partner at the law firm of Kasowitz Benson Torres LLP, with his office located at 1633 Broadway, New York, New York 10019. Mr. Schiff’s telephone number is (212) 506-1732, and his facsimile number is (212) 835-5032. Mr. Schiff’s email address is ashiff@kasowitz.com.

2. As stated in the Declaration of Adam L. Schiff, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Schiff is a member in good standing of the Bar of the

State of New York and is admitted to practice in the United States Court of Appeals for the Seventh Circuit and the United States District Courts for Southern District of New York, the Eastern District of New York, the Northern District of New York, and the Western District of New York. Further, as set forth in his Declaration, Mr. Schiff is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.

3. With reference to all matters incident to these cases, Mr. Schiff submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of these chapter 11 cases.

4. The \$281.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, movant respectfully that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Adam L. Schiff to appear before the Court *pro hac vice* in this case.

Respectfully submitted,

s/ Mignon A. Lunsford
Mignon A. Lunsford
N.C. Bar No. 46220
BURR & FORMAN LLP
421 Fayetteville Street
Suite 1100, Office 1140
Raleigh, North Carolina 27601
Telephone: (919) 334-4709
Facsimile: (919) 573-0771
Email: mlunsford@burr.com

Counsel for Itria Ventures LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of February, 2020, a true and correct copy of the ***Motion for Admission Pro Hac Vice for Adam L. Schiff*** was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/ Mignon A. Lunsford
MIGNON A. LUNSFORD

Exhibit A

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
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In re:)
)
SD-CHARLOTTE, LLC,) **Chapter 11**
RTHT INVESTMENTS, LLC,)
SD RESTAURANT GROUP, LLC,) **Case No. 20-30149**
SD-MISSOURI, LLC, and)
SOUTHERN DELI HOLDINGS, LLC,) **Jointly Administered**
)
Debtors.)

**DECLARATION OF ADAM L. SHIFF
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Adam L. Schiff, in support of the *Motion for Admission Pro Hac Vice for Adam L. Schiff* (the “Motion”), declares as follows:

1. My name is Adam L. Schiff and I am a partner at the law firm of Kasowitz Benson Torres LLP. My office is located at 1633 Broadway, New York, New York 10019. My telephone number is (212) 506-1732, and my facsimile number is (212) 835-5032. My email address is ashiff@kasowitz.com.

2. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.

3. I am a member in good standing of the Bars of the States of New York, as evidenced by the Certificate of Good Standing attached hereto as Exhibit 1, and am admitted to practice in the United States Court of Appeals for the Seventh Circuit and the United States District Courts for the Southern District of New York, the Eastern District of New York, the Northern District of New York and the Western District of New York.

4. I have never been disbarred or suspended in any court in which I am admitted to practice.

5. I have not been the subject of disciplinary action by the bar or courts of any state.

6. I am experienced in bankruptcy matters and am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules.

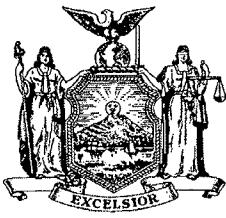
7. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of these chapter 11 cases.

8. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: February 18, 2020

s/ Adam L. Schiff
Adam L. Schiff

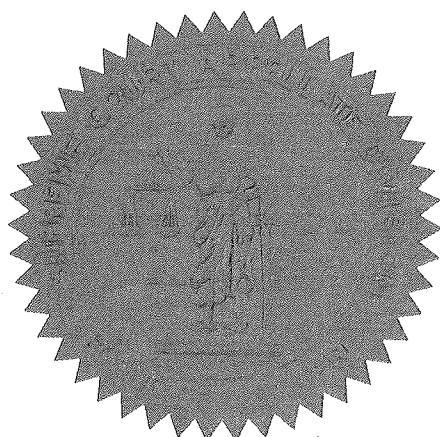
EXHIBIT 1



Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that Adam L. Schiff was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 5th day of May 1993, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on February 13, 2020.



Aprilanne Agostino

Clerk of the Court

Exhibit B

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

| | | |
|-------------------------------------|---|-----------------------------|
| SD-CHARLOTTE, LLC, |) | |
| RTHT INVESTMENTS, LLC, |) | Chapter 11 |
| SD RESTAURANT GROUP, LLC, |) | |
| SD-MISSOURI, LLC, and |) | Case No. 20-30149 |
| SOUTHERN DELI HOLDINGS, LLC, |) | Jointly Administered |
| Debtors. |) | |

**ORDER ALLOWING ADAM L. SHIFF TO
APPEAR AS COUNSEL FOR CREDITOR, *PRO HAC VICE***

This matter having become before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the *Motion for Admission Pro Hac Vice for Adam L. Schiff* (the “Motion”) filed by Mignon A. Lunsford for the admission *pro hac vice* of Adam L. Schiff, to practice in this Court for the purposes of representing Itria Ventures LLC in the above-captioned case as co-counsel together with counsel from the law firm of Burr & Forman LLP who are admitted to practice in this Court; and it appearing to the Court, and the Court so finding, that for good cause shown the Motion should be granted;

NOW, THEREFORE, IT IS HEREBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Adam L. Shiff shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned chapter 11 cases.

This Order has been signed electronically.
The Judge's signature and Court's seal appear
at the top of the Order

United States Bankruptcy Judge